





of Alexandria, VA Police Department and graduated the Basic Law Enforcement School at the Northern Virginia Criminal Justice Training Academy, located in Sterling, VA. While attending the Police Academy, your affiant received specialized training in police patrol and arrest procedures as well as conducting basic police investigations. During my tenure, your affiant has conducted and participated in several criminal investigations as well as search and seizure warrants for the illegal possession of firearms and ammunition by convicted felons in Baltimore, MD.

3. This Affidavit is in support of arrest warrants for Madani Ilara TEJAN, Donnell Edward HARRIS, and Charles JOHNSON for Interference with Commerce by Robbery, in violation of 18 U.S.C. § 1951. It is alleged that

- a. On September 11, 2013, TEJAN, HARRIS and JOHNSON interfered with/obstructed commerce by robbing a 7-11 convenience store, located at 1065 St. Ignatius Drive, Waldorf, Maryland, in violation of 18 U.S.C. § 1951.
- b. On September 20, 2013, TEJAN and HARRIS interfered with/obstructed commerce by robbing a 7-11 convenience store, located at 10203 New Hampshire Avenue, Silver Spring, Maryland, in violation of 18 U.S.C. § 1951.

**Facts and Circumstances Supporting Probable Cause**

**September 11, 2013 Robbery**

4. On September 11, 2013, at approximately 4:09 a.m., Charles County Sheriff's Office ("CCSO") deputies responded to the 7-11 convenience store located at 1065 St. Ignatius Drive, Waldorf, Maryland, based on a report that an armed robbery had just occurred. The victim advised that three suspects had entered the business. The victim stated that one of the suspects had confronted the victim, pointed a silver handgun at the victim, and stated, "go to the safe," at which point a second suspect began shoving the victim towards the cash register. As the victim was being shoved, the suspect with the gun struck the victim in the back of the



victim's head with the gun, causing the victim to fall to the floor. As the victim was on the floor, a suspect told the victim to get up and began going through the victim's pockets, removing an orange box cutter. The victim was then led to the cash register, where the suspects then stole approximately \$30.00 of U.S. Currency, approximately \$60.00 in rolled coins and several packs of Newport cigarettes. The victim was able to press the silent alarm button. One of the suspects noticed the victim's action, alerted the other suspects, and all three suspects fled from the business through the front door.

5. The victim described the suspects as follows:

- Suspect 1: Black male, wearing a black hoodie sweat shirt, dark blue jeans, light blue tennis shoes with white trim, black mask covering the lower portion of his face, holding a silver revolver in his right hand.
- Suspect 2: Black male, wearing a black hoodie sweat shirt with the words "Jet Gang" in large white letters on the back, black jeans with a white belt.
- Suspect 3: Black male, wearing a black shirt with a large white design on the front, black shirt covering the lower portion of his face, black jeans with a black "scully" on his head.

September 20, 2013 Robbery

6. On September 20, 2013, at approximately 2:39 a.m., Montgomery County Police Department ("MCPD") officers responded to the 7-11 convenience store, located at 10203 New Hampshire Avenue, Silver Spring, Maryland, in response to a report that an armed robbery had just occurred. The victims advised that two male suspects had entered the store and robbed it at gunpoint. The victims described suspect #1 as a black male with a thin build, wearing a black hooded sweatshirt, a red baseball hat with a sticker on the bill of it, green pants, black shoes with white trim, and white laces and a ski mask. He was armed with a black, semi-automatic pistol. Suspect #2 was described as a black male, wearing a black hood sweatshirt with leather sleeves, light green under shirt, blue jeans with a white belt, black sneakers and black and white gloves



and was armed with a long barreled silver revolver. Both suspects placed the victims at gunpoint and forced them to open the cash registers. The victims then took taking an unknown amount of store proceeds. The suspects also stole one of the victim's personal cellular telephones before exiting the store.

7. MCPD officers and detectives reviewed surveillance video of the September 20, 2013 robbery and observed that suspect #2 was wearing a unique black and white bracelet on his right hand.

8. On September 26, 2013, MCPD officers responded to the area of 2812 Calverton Boulevard, Silver Spring, Maryland, for a citizen strong armed robbery that had just occurred. Upon arrival, officers met with the victim, who reported that he was walking down the street when he was approached by three black males, later identified as TEJAN, JOHNSON, and HARRIS. The subjects engaged the victim in a brief conversation until TEJAN brandished a black semi-automatic pistol at the victim and stated, "There's one in the chamber, if you fucking move, I'm going to kill you. You know what this is, give me all of your shit and take off your jacket." The victim complied and gave the subjects an amount of U.S. Currency, his black North Face jacket, and a cellular telephone. The victim stated that JOHNSON then punched him in the face and the suspects fled from the scene.

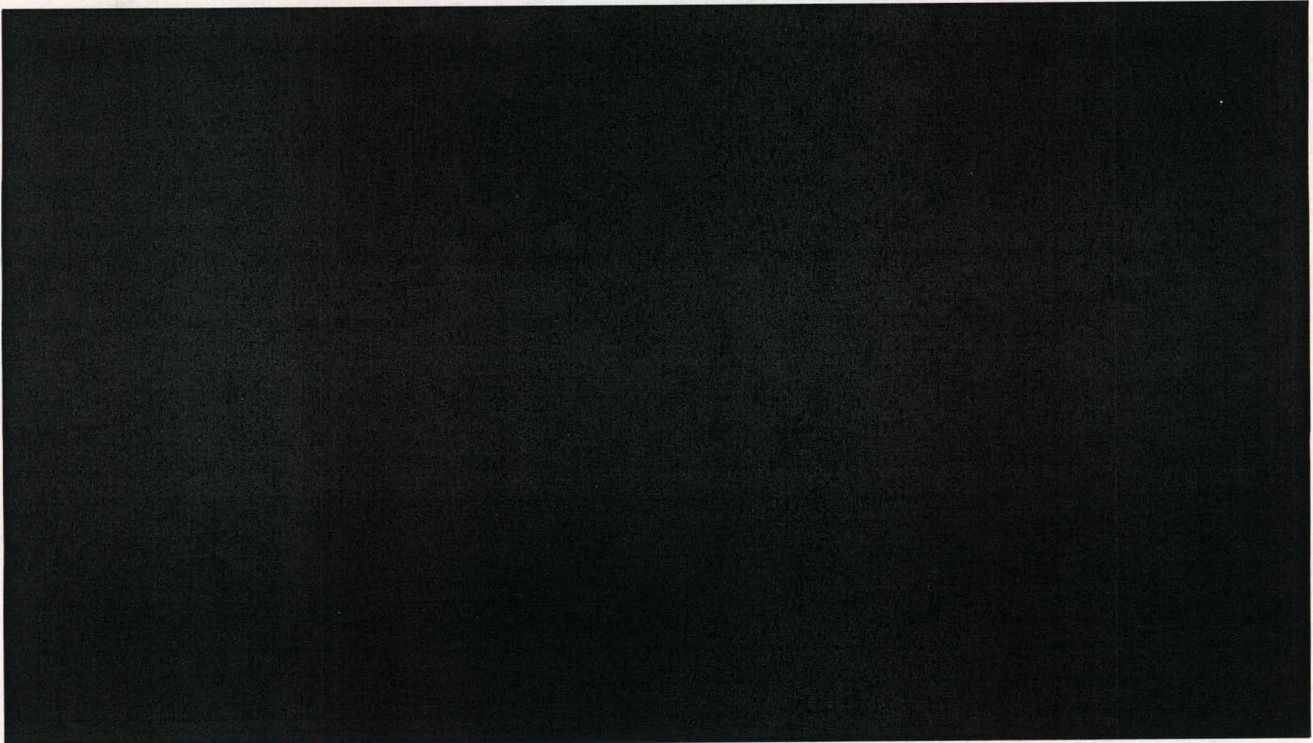
9. A lookout was broadcast and other responding officers located the three aforementioned subjects, who fled upon observing the presence of law enforcement. After a brief foot pursuit, the subjects were placed under arrest. Upon being arrested, officers discovered numerous items of clothing to include the victim's black North Face jacket near the area where the subjects were arrested. All subjects were searched and, upon searching JOHNSON's person, officers recovered a black semi-automatic pistol from JOHNSON's pants



leg. Officers also noticed a medicine bottle on the ground close to JOHNSON that bore his name which contained four plastic baggies containing suspected marijuana. Also located at the scene of the arrest was a black and white Samsung cell phone that HARRIS advised belonged to him.

10. The victim subsequently positively identified the three arrested subjects as being the individuals who had robbed and struck him.

11. Upon reviewing the surveillance video of the 7-11 robbery that occurred on September 20, 2013, detectives observed that suspect #2 in that robbery matches the height and weight of TEJAN. In addition, the subject depicted in the surveillance video is seen wearing the identical black hooded sweatshirt with leather sleeves that TEJAN was wearing on September 26, 2013. Furthermore, TEJAN also was observed to be wearing a black and white bracelet on his right wrist on September 26, 2013 which matched the size, color, and appearance as that of the bracelet detectives observed suspect #2 wearing during the September 20, 2013 7-11 robbery.







Facebook

13. Your affiant and other Detectives identified a Facebook profile page belonging to TEJAN with the username "Danny Malik Tejan." On the Facebook website, TEJAN is seen wearing a unique black and white bracelet on his right hand, which matches the size, shape and color of the bracelet worn by suspect #2 during the September 20, 2013 7-11 robbery on 10203 New Hampshire Avenue, Silver Spring, Maryland. Additionally, your affiant and other detectives identified a Facebook profile page belonging to HARRIS with the username "Shady-lo Moneybag-shawdy." On the Facebook website, HARRIS is seen wearing a red brimmed Chicago Bulls style baseball cap with a sticker on the brim. Detectives compared the picture on Facebook to the surveillance video of the September 20, 2013 7-11 robbery. In the video, the hat that one of suspects is seen wearing strongly resembles the hat that HARRIS is wearing in his Facebook picture. Additionally, in the same picture, HARRIS is observed to be wearing black tennis shoes with thick white laces and white trim on the bottom of the shoes, which strongly resemble the shoes that one of the suspects wore in the September 20, 2011 7-11 armed robbery. In the surveillance video, this same suspect is wearing a pair of green pants. HARRIS also matches the height and weight of the suspect seen wearing these clothing items.

HARRIS's Cellphone

14. Following HARRIS's arrest on September 26, 2013, detectives obtained a search warrant for the black and white Samsung phone that was recovered and which HARRIS



identified as his. Located inside of the phone were numerous text messages in which HARRIS talks about robbing people and places. On September 16, 2013, HARRIS sent a text to an unknown person and stated that he robbed "like 4 711's dis past week and ah half."

Destruction of Evidence

15. In furtherance of their investigation, detectives also obtained telephone calls made by inmates at the Montgomery County Detention Center. On October 9, 2013, a phone call was placed to an individual later identified as HARRIS's mother. During several phone calls, a person is heard speaking with HARRIS's mother. During an October 9, 2013 phone call, a person calling from the Detention Center told HARRIS's mother to get rid of HARRIS's green Levi pants, black Polo shoes, and Chicago Bulls hat. HARRIS can be heard in the background of the call. During the call, the caller stated that HARRIS is being charged with the 7-11 robberies and that is why these items of clothing need to be destroyed. Detectives were able to confirm through the store surveillance footage that these items of clothing matched the items that were worn during the 7-11 robbery that occurred on September 20, 2013. HARRIS's mother told the caller that she would destroy these items and asked if there is anything else that needs to be destroyed.

16. On November 13, 2013, detectives executed a Search Warrant at the home address of HARRIS's mother. During the execution of the search warrant, detectives were unable to locate the aforementioned items of clothing but did locate a shoebox with the brand name "Polo" in the bedroom of HARRIS. A picture on the side of the box showed a black tennis shoe with wide white laces and white trim on the soles, which strongly resemble the shoes seen in the surveillance footage of the 7-11 robbery that occurred on September 20, 2013 as well as the shoes that HARRIS is seen wearing in his Facebook picture.



Effect on Interstate Commerce

17. During the course of the investigation, your affiant learned that the 7-11, located at 10203 New Hampshire Avenue, Silver Spring, Maryland, deposits the nightly proceeds into an account at the Bank of America located in White Oak, Maryland. Additionally, this store receives nightly deliveries to replenish supplies from a distribution center located in Virginia.

18. During the course of the investigation, your affiant learned that the 7-11, located at 1065 St. Ignatius Way, Waldorf, Maryland, deposits the nightly proceeds into an account at the M&T Bank located in Waldorf, Maryland. Additionally, this store receives nightly deliveries to replenish supplies from a distribution center located in Virginia.

Records Checks

19. Your affiant reviewed the criminal history of TEJAN, which revealed the following criminal convictions:

- 05-24-2013: Guilty of Assault – 2<sup>nd</sup> Degree and VOP in the Circuit Court for Prince Georges County, Maryland, Case Number CT121643A. TEJAN was sentenced to 10 years in prison with 9 years, 15 days suspended and 9 years, 5 months, 15 days probation on the first count and 1 year, 6 months in prison with 1 months, 10 days suspended and 4 years probation on the second count.
- 05-24-2013: Guilty of Theft Over \$500 in the Circuit Court for Prince Georges County, Maryland, Case Number CT110967X. TEJAN was sentenced to 1 year, 6 months in prison with 8 months, 20 days suspended and 3 years probation.
- 12-15-2010: Guilty of Theft: Less Than \$1000 in Value in the District Court of Maryland for Prince Georges County, Case Number Unknown. TEJAN was sentenced to 180 days in prison with 126 days suspended and 3 months, 5 days probation.

20. Your affiant reviewed the criminal history of HARRIS, which revealed the following Criminal Convictions:

- 10-08-2010: Guilty of Armed Robbery and VOP in the Circuit Court for Montgomery County, Maryland, Case Number 116205C. HARRIS was sentenced to 10 years in prison with 8 years, 6 months suspended and 5 years probation on the first count and an undetermined sentence for the second count.



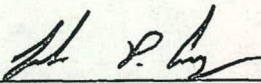
- 04-30-2009: Arrested for two (2) counts of Robbery With a Dangerous And Deadly Weapon in Montgomery County under Circuit Court Case Number 113041C. HARRIS was remanded to Juvenile Court for this arrest.

21. Your affiant reviewed the criminal history of JOHNSON, which revealed several prior arrests but not criminal convictions.

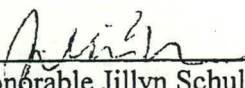
**Conclusion**

22. Based on the information, facts and circumstances stated above, your affiant believes probable cause exists to find that:

- a. On September 11, 2013, TEJAN, HARRIS and JOHNSON interfered with / obstructed commerce by robbing a 7-11 convenience store, located at 1065 St. Ignatius Drive, Waldorf, Maryland, in violation of 18 U.S.C. § 1951.
- b. On September 20, 2013, TEJAN and HARRIS interfered with / obstructed commerce by robbing a 7-11 convenience store, located at 10203 New Hampshire Avenue, Silver Spring, Maryland, in violation of 18 U.S.C. § 1951.

  
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Special Agent John P. Cooney  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Baltimore, Maryland

Subscribed and sworn to before me this 26 day of March, 2014

  
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Honorable Jillyn Schulze  
United States Magistrate Judge